



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	Agent
Name:	Paul Brady
Reference:	GDKLPF-150616
Submission Made	November 21, 2025 3:35 PM

Topic

LAP - Proposed Material Amendments No 25 Submission

Submission

Please see attached Cover Letter and Maps

File

22249_Zoning Submission re. Material Alteration No.25.pdf, 1.27MB

Our ref: 22249

Variation No. 4,
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road, Wicklow Town, A67FW96

Attention: WCC Planning Department

19th November 2025

Submission via Wicklow County Council Consultation Portal

<https://greystones-delgany-kilcoole-lap-wicklow.hub.arcgis.com/pages/submission>

Re:

Submission for consideration to the draft Local Planning Framework / Variation No. 4, Greystones-Delgany & Kilcoole LAP

Dear Sir, Madam

We refer to the Draft Greystones / Delgany & Kilcoole Local Planning Framework – Variation No. 4, and specifically Material Alteration 25: SLO 11 – Ballycrone.

On behalf of the Landowner, Paul Brady, of Sherlock's Lane, Kilcoole, we would like to make the following observations for consideration:

1. 'Access to Active Open Space' (AOS)
2. Configuration of zoning outlines



Proposed Material Alteration no. 25: SLO 11 – Ballycrone

We welcome the overall proposal to add an area of land measuring circa 4.6ha from unzoned, outside the settlement/LPF boundary to RE 'Existing Residential' (c. 0.3ha), RN1 'New Residential – Priority 1' (c. 2.3ha) and AOS 'Active Open Space' (c. 2ha).

However, we believe there are a number of reasons why some amendment is required to these proposals, to ensure that the amenity facilities and residential development which is the objective of this change, can be achieved within the lifetime of the Plan. We are seeking some practical changes to the geometry of the zoning subdivision, and the wording to accompany it, which will ensure it is fully deliverable.

1. Access to Active Open Space (AOS)

This proposed material alteration is very specific in setting out how the lands should be accessed, and this is where there are practical difficulties which need to be addressed. The first stipulation is that :-

"Vehicular access to the AOS, "Active Open Space" lands shall be via employment lands to the west. Vehicular access to these AOS lands shall strictly not be via residential zones. Design measures shall be integrated in the development of RN1 "New residential – Priority 1" lands to ensure no access including drop offs or temporary parking for the AOS lands. Any access via Sherlock's lane shall be for pedestrian/cyclists only".

We have no issue with the stipulation that Sherlock's Lane shall be used for pedestrian or cycle access only – this will preserve the rural character of that Lane. However, there is a fundamental difficulty with the proposal to restrict vehicular access to the AOS through the employment lands to the west, which means through the Network Enterprise Park.

This Enterprise Park is not in taken in charge and these roads are private and gated. The hours of access are restricted and it is not a suitable access route therefore, for leisure activity which will largely take place outside of Business Park hours, when the barriers may be down.

The second difficulty is the estate roads in the Business Park do not reach to the boundary and the lands dividing the existing Enterprise park and the new employment zoning are in 3rd-party ownership. Our client, who is the landowner of the employment as well as the RE and AOS lands, does not have control of this access point.

The third difficulty is that the AOS lands would have to be accessed across an undeveloped employment zone, which may take a very long time to develop and would not be sustainable to build on its own. This is not realistic, given these industrial lands have been zoned since 2008 with no demand to develop them.

We consider that the absolute logic for access to the AOS is through the new residential development which will be built on the RN1 lands. It is a requirement of any development on the RN1 lands, that they deliver a fully developed AOS Facility, including Gaelic pitch, basketball courts, Dog Park and Boxing Club building. It is entirely proper therefore, that

access be provided as part of that development, instead of as part of an employment zoning on which it is not conditioned.

We see no conflict between a residential use and access to a sporting facility. It will, if anything, enhance both the residential development and give passive surveillance to the Amenity facility, rendering it safer for its users.

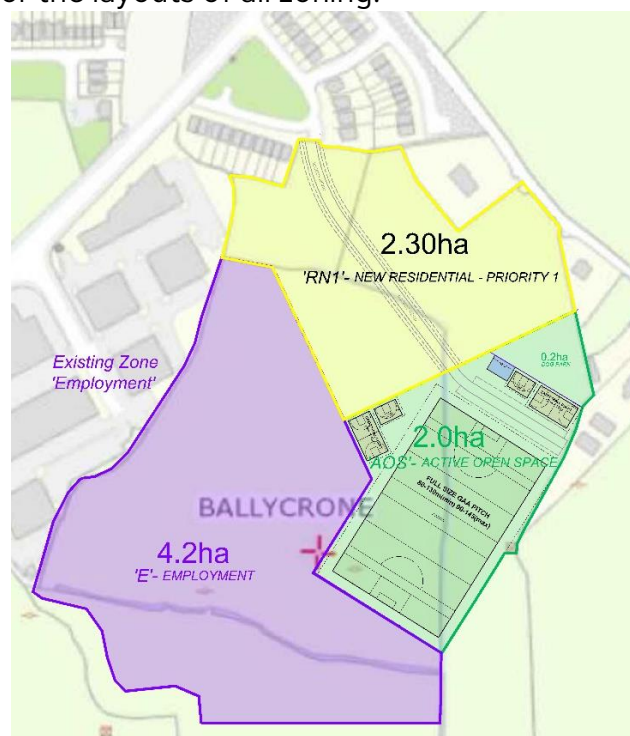
We respectfully request that the wording be amended to allow vehicular access to the AOS lands via the RN1 lands.

2. Configuration of Zoning outlines

We have looked at the proposed shape of the zoning in the Draft amendment, and ask that some practical adjustments be made. The facilities to be provided are very specific and have specific minimum sizes. A full-size Gaelic pitch for example, is a minimum of 80m x 130m and cannot fit at the southern end of the zoning, because the site narrows. It also needs room around the side for spectators and officials, and room to get vehicles in and out to the other facilities. The only place the pitch will fit in the current configuration, is at the northern end, cutting off circulation to the southern part of the site and the current width is too narrow for pitch and circulation. The current configuration also creates a 'pinch point' in the RN1 lands which will make it hard to plan and it comes to a sharp point, which is also hard to develop. Our proposed alternative zone shaping would solve these issues.

We also note from our measurement of the lands, that the areas of the shaded zoning seem to be less than the numbered areas given in the written text. We measure the proposed RN1 as 2.17Ha rather than 2.3 and we measure the AOS as 1.93Ha, rather than 2.

In order to justify our submission, we have prepared a sketch layout of the principal elements of the AOS lands, and now attach this as our alternative proposal for the subdivision of the zoning. In our proposal, there will continue to be 2.3Ha of RN1, 2Ha of AOS and 4.2 Ha of Employment zoning. However, the revised configuration will allow the facilities to be accessed, without first having to get past the playing pitch, and provides a more practical shape for the layouts of all zoning.



The existing Ballycrone Manor development has been developed on our clients' former lands, in partnership with Tullyagan Homes. Our client can provide full access through Ballycrone Manor for both the RN1 and AOS lands and the development of this residential scheme will deliver a fine Active Amenity facility for the residents of Kilcoole.

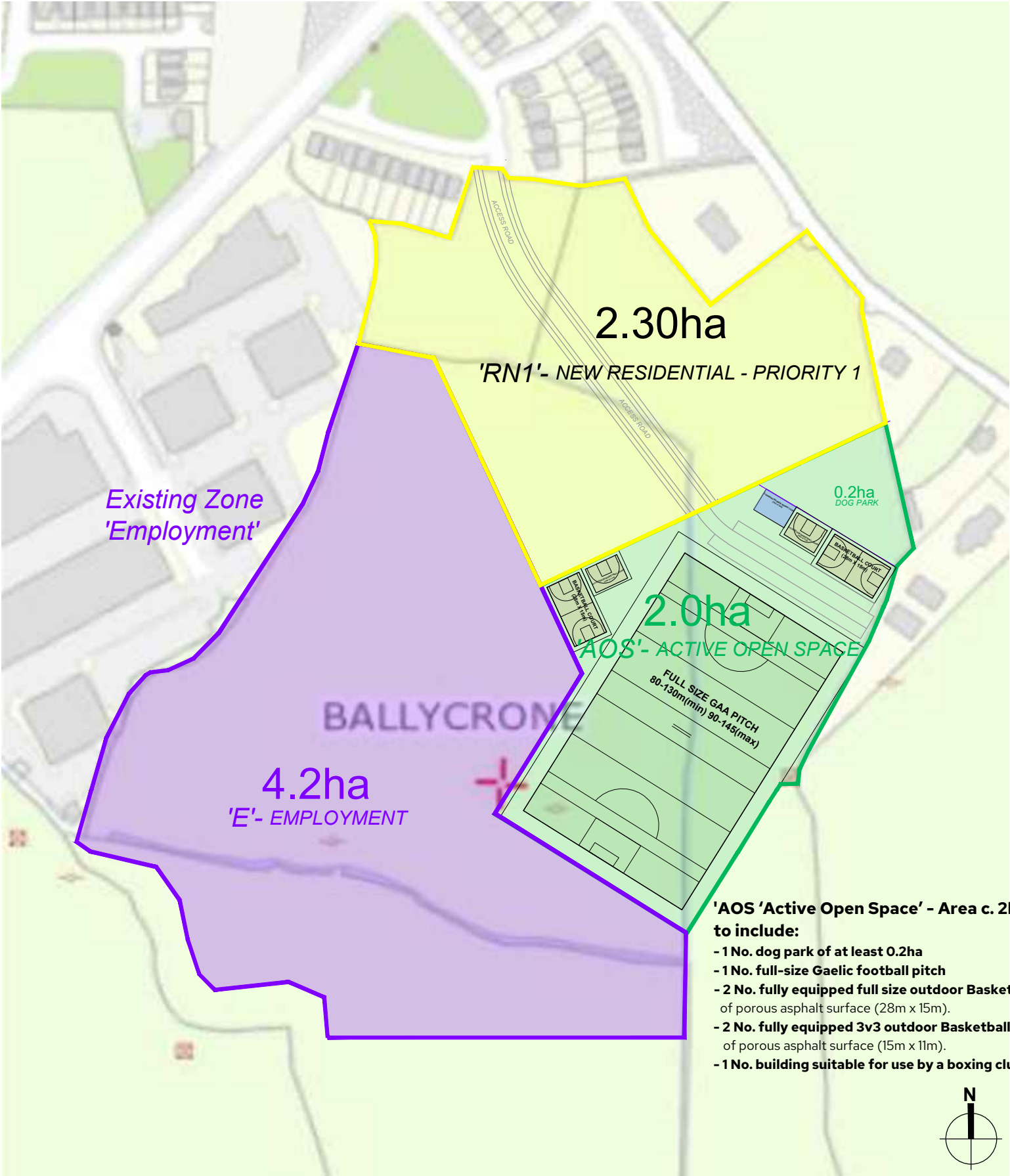
We respectfully request that the wording be amended to allow for vehicular access through the RN1 lands, and that the shaping of the proposed zoning be amended so that a practical and useful amenity facility can be planned.

Yours faithfully,


Stephen Collins, FRIAI
Director, COMMA Architects

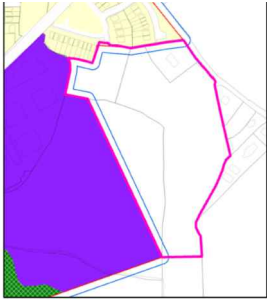


Enclosed: Drawing No. 22249- ZS-01- Rezoning Proposal re. the Draft Greystones / Delgany & Kilcoole Local Planning Framework - Variation No. 4 and Material Alteration 25: SLO 11 - Ballycrone.

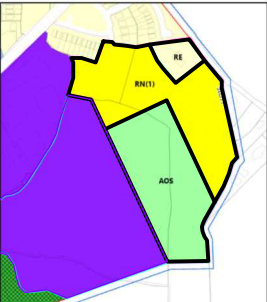


PROPOSED ZONING REVISION

- 'AOS 'Active Open Space' - Area c. 2ha to include:
- 1 No. dog park of at least 0.2ha
 - 1 No. full-size Gaelic football pitch
 - 2 No. fully equipped full size outdoor Basketball Courts of porous asphalt surface (28m x 15m).
 - 2 No. fully equipped 3v3 outdoor Basketball Courts of porous asphalt surface (15m x 11m).
 - 1 No. building suitable for use by a boxing club

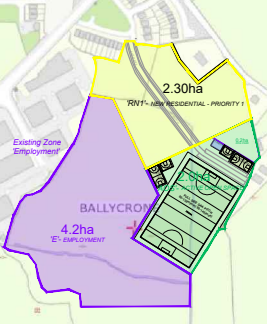


Existing Zoning



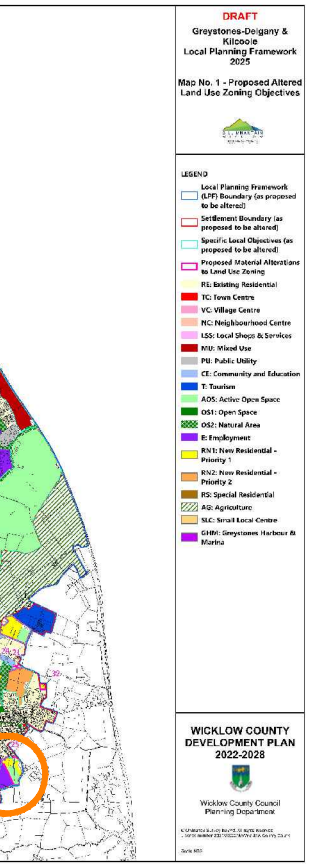
Zoning proposed by Wicklow County Council under the Draft for Greystones / Delgany & Kilcoole Local Planning Framework - Variation No. 4, and Material Alteration 25: SLO 11 - Ballycrone.

Amend zoning of land at Ballycrone measuring c. 4.6ha from unzoned outside the settlement/LPF boundary to RE 'Existing Residential' (c. 0.3ha), RN1 'New Residential - Priority 1' (c. 2.3ha) and AOS 'Active Open Space' (c. 2ha)



Proposed revision to WCC proposal

- 'RN1' New Residential - Priority 1'- Area c. 2.3ha**
- 'AOS 'Active Open Space' - Area c. 2ha**
- 'E' Employment- Area c. 4.2ha**



No.	Revisions	Date
Figured dimensions only to be taken from this drawing. All dimensions to be checked on site before work commences.		
ZONING SUBMISSION		
COMMA architects		
Dodder Park Road Rathfarnham Dublin 14 T: 01 - 490 0637-8 F: 01 - 490 7633 W: www.comma.ie E: info@comma.ie		
Scale	nts	Client Paul Brady
Date	November 2025	Proposed rezoning of lands at Project Ballycrone Manor, Kilcoole, Co.Wicklow
Drawn	COMMA	
Title	Rezoning Proposal re. the Draft Greystones / Delgany & Kilcoole Local Planning Framework - Variation No. 4 and Material Alteration 25: SLO 11 - Ballycrone.	Job No. 22249
Drig No:	ZS-01	Status Rev